

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

CASSANDRA ANN BEATTY  
and TERRENCE DAVIS

Defendants.

M.B.D. No.

04-10013 RGS

JOINT MOTION TO EXCLUDE TIME  
FROM SPEEDY TRIAL ACT COMPUTATIONS

The parties, by their undersigned counsel, hereby move that, pursuant to 18 U.S.C. §§ 3161(b) and 3161(h), the Court exclude from all Speedy Trial Act calculations (including any calculations made pursuant to 18 U.S.C. § 3161(b)) the period beginning February 27, 2004 and extending for approximately 30 days thereafter (to and including March 26, 2004). As grounds therefor, the parties state as follows:

1. The defendants were arrested on December 2, 2002, after arriving at Logan Airport from Jamaica. On December 3, 2003, they were charged by criminal complaint with importation of cocaine, which they allegedly ingested. The defendants waived a detention hearing without prejudice and are currently in custody.

2. This Court has previously issued Orders allowing the parties' motions to exclude from all Speedy Trial Act calculations the period of time through February 27, 2004.

3. The parties request a final extension of time and believe that the ends of justice served by the delay outweigh the

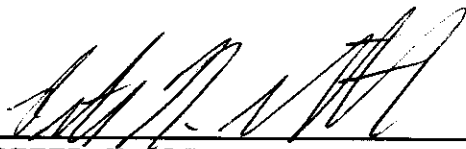
interest of the public and the defendants in a speedy trial.

Based on the foregoing, the parties jointly move that the time between February 27, 2004 to and including March 26, 2004, be excluded from all Speedy Trial calculations.

Respectfully submitted,

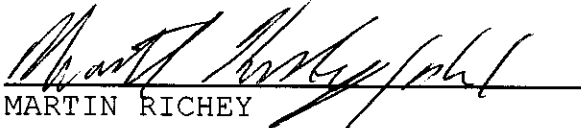
MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

By:

  
PETER K. LEVITT  
Assistant U.S. Attorney  
One Courthouse Way  
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(617) 748-3355

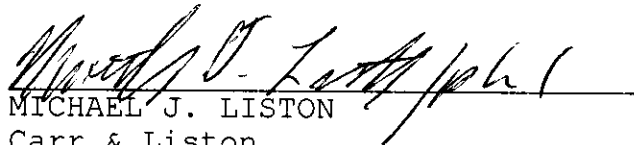
CASSANDRA BEATTY

By her attorney,

  
MARTIN RICHEY  
Federal Public Defender  
640 Atlantic Avenue  
Boston, MA  
(617) 223-8061

TERRENCE DAVIS

By his attorney,

A handwritten signature in dark ink, appearing to read "Michael J. Liston", is written over a horizontal line.

MICHAEL J. LISTON  
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(617) 482-6355

Dated: February 25, 2004